

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

BANCREDITO HOLDING CORPORATION,
on its own behalf and derivatively for the
benefit of and on behalf of Nominal Defendant
BANCREDITO INTERNATIONAL BANK
AND TRUST CORPORATION,

Plaintiff,

v.

DRIVEN ADMINISTRATIVE SERVICES,
LLC,

Defendant,

BANCREDITO INTERNATIONAL BANK
AND TRUST CORPORATION,

Nominal Defendant.

CIVIL NO. 24-1039 (CVR)

INFORMATIVE MOTION

COMES NOW, Defendant, Driven Administrative Services LLC, as receiver of Bancrédito International Bank & Trust Corporation (“Driven” or the “Receiver”), without submitting to this Court’s jurisdiction, and respectfully states and requests as follows:

1. Today, the Court issued an Opinion and Order correctly granting the Receiver’s Motion to Dismiss and entered Judgment dismissing the above-captioned complaint. See Docket Nos. 65 and 67.

2. In addition, the Court denied as moot various other motions, including the Motion to Disqualify filed by Bancrédito Holding Corporation. See Docket No. 66.

3. Concurrently with the Court’s notification of the orders, the undersigned was in the process of filing the Receiver’s Opposition to the Motion to Disqualify McConnell Valdés as

Counsel For Driven Administrative Services LLC (which deadline was today) (the “Opposition”). Due to the misleading, unfounded and frivolous nature of the allegations made by Bancrédito Holding Corporation in its Motion to Disqualify (Docket No. 49), against the Receiver and against McConnell Valdés, it was imperative that our position be submitted to the Court and made part of the case record. It is for this reason that the undersigned filed the Opposition. See Docket No. 68.

WHEREFORE, the Receiver respectfully requests that this Court take notice of the foregoing.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 11th day of July, 2024.

CERTIFICATE OF SERVICE: It is hereby certified that on this date the instant document was filed with the Clerk of the Court through the CM/ECF electronic system which will notify and provide copies to all parties of record.

McCONNELL VALDÉS LLC

270 Muñoz Rivera Ave.

San Juan, PR 00918

P.O. Box 364225

San Juan, PR 00936-4225

T. 787.250.5632

F. 787.759.82

s/Arturo J. García-Solá

Arturo J. García-Solá

USDC-PR No. 201903

ajg@mcvpr.com

s/Juan A. Marqués Díaz

Juan A. Marqués Díaz

USDC-PR No. 211803

jam@mcvpr.com